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Attorneys for Defendants
Transamerica Life Insurance Company,
Transamerica Investment Management, LLC
and Transamerica Asset Management, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JACLYN SANTOMENNO, KAREN
POLEY, and BARBARA POLEY, et
al.,

Plaintiffs,

v.

TRANSAMERICA LIFE
INSURANCE COMPANY,
TRANSAMERICA INVESTMENT
MANAGEMENT, LLC, and
TRANSAMERICA ASSET
MANAGEMENT, INC.,

Defendants.

: Civil Action No. 11-736 (ES) (PS)

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**NOTICE OF TRANSAMERICA
INVESTMENT MANAGEMENT,
LLC AND TRANSAMERICA
ASSET MANAGEMENT, INC.'S
MOTION TO DISMISS CLASS
ACTION COMPLAINT**

TO: Robert L. Lakind
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Attorneys for Plaintiffs

COUNSEL:

PLEASE TAKE NOTICE that on Monday, September 19, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, Defendants Transamerica Investment Management, LLC (“TIM”), now no longer doing business and formerly located at 11111 Santa Monica Boulevard, Los Angeles, California 90025, and Transamerica Asset Management, Inc. (“TAM”), located at 570 Carillon Parkway, St. Petersburg, Florida 33716, by and through their undersigned counsel, will move before the Honorable Esther Salas, U.S.D.J., for entry of an order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Class Action Complaint in this case with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this motion, TIM and TAM will rely upon the Memorandum and supporting Declaration of Darcy Hatton submitted herewith. A proposed form of Order is also submitted. TIM and TAM request oral argument of this motion.

Dated: July 29, 2011

s/ Thomas R. Curtin

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